

Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

Submission form on publicly notified – Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

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|----------------------------|---------|-------------------|--|
| SubForm | PC12016 | COVER SHEET | |
| FOR OFFICE USE ONLY | | | |
| | | Submission Number | |
| Entered | | Initials | |
| File Ref | | Sheet 1 of | |

FORM 5 Clause 6 of First Schedule, Resource Management Act 1991

| SUBMISSIONS CAN BE | |
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| Mailed to | Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240 |
| Delivered to | Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton |
| Faxed to | (07) 859 0998 <i>Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses</i> |
| Emailed to | healthyrivers@waikatoregion.govt.nz <i>Please Note: Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.</i> |
| Online at | www.waikatoregion.govt.nz/healthyrivers |
| We need to receive your submission by 5pm, 8 March 2017. | |

| YOUR NAME AND CONTACT DETAILS | | |
|-------------------------------|--|------------------------------|
| Full name | <u>Eric Allan</u> | |
| Full address | <u>9B Aldred Road Remuera Auckland</u> | |
| Email | <u>eallan@xtra.co.nz</u> | Phone <u>09 5240 754</u> Fax |

| ADDRESS FOR SERVICE OF SUBMITTER | | |
|---|--|----------------------------|
| Full name | <u>Eric Allan</u> | |
| Address for service of person making submission | <u>9B Aldred Road Remuera Auckland</u> | |
| Email | <u>eallan@xtra.co.nz</u> | Phone <u>095240754</u> Fax |

| TRADE COMPETITION AND ADVERSE EFFECTS <i>(select appropriate)</i> |
|---|
| <input type="checkbox"/> I could / <input checked="" type="checkbox"/> could not gain an advantage in trade competition through this submission. |
| <input checked="" type="checkbox"/> I am / <input type="checkbox"/> am not directly affected by an effect of the subject matter of the submission that: (a) adversely effects the environment, and (b) does not relate to the trade competition or the effects of trade competition. Delete entire paragraph if you could not gain an advantage in trade competition through this submission. |

THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 1 THAT MY SUBMISSION RELATES TO

*Please state the provision, map or page number e.g. Objective 4 or Rule 3.11.5.1
(continue on separate sheet(s) if necessary.)*

Objectives 1, 2 and 4 and Table 3.11.1

I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

(select as appropriate and continue on separate sheet(s) if necessary.)

- Support the above provisions
- Support the above provision with amendments
- Oppose the above provisions

MY SUBMISSION IS THAT

*Tell us the reasons why you support or oppose or wish to have the specific provisions amended.
(Please continue on separate sheet(s) if necessary.)*

I support the protection and restoration of the river system to a point of it being genuinely swimmable and for food to be gatherable and overall water quality accordingly restored. This also needs to be a sustainable process for farming in the catchment such that water is protected and farming is also sustainable and protections are equitable between farmers.

I SEEK THE FOLLOWING DECISION BY COUNCIL

(select as appropriate and continue on separate sheet(s) if necessary.)

- Accept the above provision
- Accept the above provision with amendments as outlined below
- Decline the above provision
- If not declined, then amend the above provision as outlined below

Amend as follows:

Amend the objectives so that it redresses the current imbalance between achieving the table 3.11.1 water quality outcomes and providing for economic and community wellbeing including ensuring family businesses remain vibrant and resilient going forward. Requirements to provide for economic wellbeing including vibrancy and and resilience of farming within the region and certainty for the future should be strengthened within the plan. The table 3.11.1 water quality outcomes should be reviewed to ensure that while achieving the vision and strategy for the Waikato River they are also achievable given current land uses and technology.

The specific provisions of the proposal that this submission relates to and the matters raised and decisions it seeks from Council are as detailed in the following table. The outcomes sought and any wording used is a suggestion only and it is with the intention of 'or words to that effect'. The outcomes sought may also require changes to the plan including Objectives, Policies or other rules or restructuring of the Plan or parts thereof to give effect to the relief sought.

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PLEASE INDICATE BY TICKING THE RELEVANT BOX WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION

I wish to speak at the hearing in support of my submissions.

I do not wish to speak at the hearing in support of my submissions.

JOINT SUBMISSIONS

If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW

| | |
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| <input checked="" type="checkbox"/> Yes, I have attached extra sheets. | <input type="checkbox"/> No, I have not attached extra sheets. |
|--|--|

SIGNATURE OF SUBMITTER
(or person authorised to sign on behalf of submitter)
A signature is not required if you make your submission by electronic means.

| | |
|---|-------------------|
| Signature  | Date 2 March 2017 |
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Personal information is used for the administration of the submission process and will be made public. All information collected will be held by Waikato Regional Council, with submitters having the right to access and correct personal information.

PLEASE CHECK that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.

Additional sheet to assist in making a submission

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| Section number of the Plan Change | Support /Oppose | Submission | Decision sought |
|---|---|---|---|
| Please refer to title and page numbers used in the plan change document | Indicate whether you support or oppose the provision. | State in summary the nature of your submission and the reasons for it. | State clearly the decision and/or suggested changes you want Council to make on the provision. |
| Plan Change 1 | Oppose | While the intent is supported the mechanisms for achieving the sustainable management of land and waer recourses are opposed as they provide no certainty for sustainable farming in the future and contain elements which will have adverse effects on some land uses and are unlikely to achieve the desired environmental outcomes | The specific provisions of the proposal that this submission relates to and the matters raised and decisions it seeks from Council are as detailed in the following table. The outcomes sought and any wording used is a suggestion only and it is with the intention of 'or words to that effect'. The ougcomes sought may also require changes to the plan including Objectives, Policies or other rules or restructuring of the Plan or parts thereof to give effect to the relief sought. |

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| <p><u>Permitted activity rules</u> <u>3.11.5.2</u></p> | <p><u>Oppose</u></p> | <p><u>As I understand the provision relating to grazing land (or forage crops grazed in situ) over 15 degrees in slope a large percentage of my farm would have to be retired from cattle grazing and we would be limited to sheep farming. In addition we lease 80 acres of our total land area and this is grazed by cattle. Virtually all of this is over 15 degrees. This would limit this lease block to sheep farming only as I understand the rules for excluding cattle.</u></p> <p><u>I consider that the reference to stocking rate at 22 October 2016 is very arbitrary and could be very unfair as rates vary a lot depending on the timing of buying and selling stock. I could be penalised by stock that I happened to sell just prior to that date or because I had yet to buy young stock. I believe that a more equitable approach is possible and should be developed.</u></p> <p><u>We also have a difficulty in that some of our property (80 acres) has been leased out. In this situation we do not have reliable information on stocking rates on this property in part as our lessee operates this property in conjunction with a number of other properties and stock are regularly moved between blocks which are effectively run as one 'farm'.</u></p> <p><u>See comments below also about Farm Environment plans.</u></p> | <p><u>Enable stocking rates of up to 18 stock units.</u></p> <p><u>Incorporate relief sought under stock exclusion below and in relation to the deleting any requirement to manage to or below a properties nitrogen reference point</u></p> |
| <p><u>Stock exclusion Schedule C and related rules.</u></p> | <p><u>Oppose</u></p> | <p><u>We are drystock farming. There is a need to have a practicable way to approach the exclusion of cattle etc. With some of wide wet gullies on our property and some steep drops to streams the implications for fencing cost and areas of the farm removed from grazing will be very considerable. The practicality of fencing etc to change some of these areas to sheep only pose real difficulties. In some areas this is going to require very expensive water reticulation costs.</u></p> <p><u>On a farm such as ours it is essential to have crossings over the creek that bisects the farm. It is important that we are able to have crossings that are effective and do not add extra cost.</u></p> | <p><u>I want practical responses to the issues raised. I am confident that the hearing will gain information from various people with suggestions as to how to address these issues.</u></p> <p><u>Delete the requirement to exclude cattle and deer through permanent fencing from all permanently flowing water bodies on hill country greater than 15 degrees slope.</u></p> <p><u>Delete the requirement to have formed crossing structures and only require simple crossings.</u></p> |

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| <p><u>3.11.5.3 and 3.11.5.4 and schedule B Nitrogen Reference Point and Schedule 1 FEP</u></p> | <p>oppose</p> | <p>The nitrogen reference point being based on 2014/15 and 2015/16 Page 47) is unfairly arbitrary. There are reasons why some years we may need to use more or less fertilizer and some years can be arbitrarily low. This is an unfair basis.</p> <p>In addition this clause is effectively a grand-parenting of people who have used very high levels of fertilizer which is unfair to those who have deliberately been moderate in our fertilizer use. This is highly inequitable.</p> <p>It also seems the provision could stop any further development of our farm and farms generally. This would be a tragedy for all affected rural communities as responsible development (which is not destructive of the environment) is central to the psyche of so many farmers.</p> <p>In relation to Certified Industry Schemes as I understand there are none in existence so it is impossible to make any meaningful comment. It is very disquieting to be invited to submit on an unknown and undefined assumption.</p> <p>There is also ambiguity re Farm Environment Plans. I have questions as to the integrity of such plans and how they can be equitable between people and not left to inconsistent interpretation and implementation or to gaming. It is important that the requirements on people are consistent between people in relation to their farms and the environmental risks and impacts. Those having the greatest impacts should be required to make the biggest changes and remediation.</p> <p>There are also added difficulties for us given that we have part of the block leased out and our lessees are buying fertilizer for a number of properties. This confuses the issue as to how much is used on the area of our farm which is leased to them.</p> <p>In addition I am aware that there is widespread concern about the accuracy of OVERSEER for its reliability for properties like ours. To tie us to an unreliable measure is highly problematic.</p> | <p>Delete requirements to be held at or below a property's nitrogen reference level for drystock farming.</p> <p>Allow flexibility in nitrogen discharges for low leaching land uses such as drystock farming.</p> <p>Delete OVERSEER as a regulatory tool.</p> <p>Include a list of Certified Industry Schemes</p> <p>Amend Schedule 1 FEP so that its application is equitable between people and not left to inconsistent interpretation and to gaming.</p> <p>Amend the plan so that it addresses issues associated with lease blocks and difficulty in determining inputs such as fertilizer to those blocks.</p> |
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